

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

<p>-----X</p> <p>IN RE NORTEL NETWORKS CORP. SECURITIES LITIGATION</p> <p>-----X</p> <p><i>This Document Relates To:</i> Case No. 04 Civ. 02115 (LAP)</p>	<p>Master File No. 05 MD 1659 (LAP)</p> <p><u>ECF Filed</u></p>
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AFFIDAVIT OF DANIEL L. BERGER IN SUPPORT OF
LEAD PLAINTIFFS' MOTION FOR CLASS CERTIFICATION

I, Daniel L. Berger, affirm as follows:

1. I am an attorney licensed to practice law in the State of New York and a member in good standing of the bar of this Court. I am a member of the law firm of Bernstein Litowitz Berger & Grossmann LLP, lead counsel for lead plaintiffs Ontario Teachers' Pension Plan Board ("Ontario Teachers") and the Department of the Treasury of the State of New Jersey and its Division of Investment ("New Jersey") (collectively, "Lead Plaintiffs") in this action. I respectfully submit this affidavit, together with the exhibits annexed hereto, in support of Lead Plaintiffs' motion: (1) to certify this action as a class action pursuant to Fed. R. Civ. P. 23(a) and (b)(3) on behalf of the Class as defined in the accompanying Motion; (2) to certify Ontario Teachers and New Jersey as Class Representatives; and (3) to appoint the law firm of Bernstein Litowitz Berger & Grossmann LLP as Lead Class Counsel pursuant to Fed. R. Civ. P. 23(g). I am fully familiar with the facts set forth herein.

2. Attached as exhibits are true and correct copies of the following:

Exhibit A: Judy Bocklage, *Nortel Restates 2003 Results, Appoints Ethics Officer*,
DOW JONES BUSINESS NEWS, January 11, 2005;

Exhibit B: *Nortel Executives to Repay \$8.6 Mln in Bonuses*, REUTERS NEWS,
January 11, 2005;

Exhibit C: Firm Resume of Bernstein Litowitz Berger & Grossmann LLP;

Exhibit D: Certification of Michael Padfield, Senior Legal Counsel, Investments for
Ontario Teachers' Pension Plan Board, dated May 14, 2004 (originally
submitted in support of Ontario Teachers' motion to be appointed Lead
Plaintiff);

Exhibit E: Certification of John E. McCormac, CPA, Treasurer of the State of New Jersey, dated May 15, 2004, (originally submitted in support of New Jersey's motion to be appointed Lead Plaintiff).

I declare, under penalty of perjury, that the foregoing is true and correct. Executed this 13th day of May 2005.

_____/s/_____
DANIEL L. BERGER